

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MAUREEN STEWART, an individual,
and KELLY LAMICELLA, an individual,
on behalf of themselves and all others
similarly situated, and ROES 1 through
100, inclusive,

Plaintiffs,

vs.

BEAM GLOBAL SPIRITS & WINE,
INC., a corporation; JIM BEAM
BRANDS, CO.; SKINNY GIRL
COCKTAILS, LLC; SGC GLOBAL, LLC;
BETHENNY FRANKEL, and DOES 1
through 100, inclusive,

Defendants.

**Civil Action No. 1:11-cv-05149 (NLH)
(KMW)**

**NOTICE OF MOTION FOR LEAVE
TO AMEND FIRST AMENDED
COMPLAINT PURSUANT TO
FED. R. CIV. P. 15(A)**

TO: COUNSEL ON ATTACHED SERVICE LIST VIA ECF

PLEASE TAKE NOTICE that on July 2, 2012, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for Plaintiffs Maureen Stewart and Kelly Lamicella, will move before the Honorable Noel L. Hillman, U.S.D.J., at the Mitchell H. Cohen United States Courthouse, Room 6020, 1 John F. Gerry Plaza, Camden, New Jersey, for an order permitting Plaintiffs' to file and serve a Second Amended Complaint in the form annexed hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the movants will rely upon the accompanying Memorandum, proposed Second Amended Complaint, and papers previously filed in this matter. A proposed form of Order is submitted herewith.

Oral argument is not requested unless the motion is opposed.

Dated: June 4, 2012

SKOLOFF & WOLFE, P.C.

By: s/ David B. Wolfe

David B. Wolfe, Esq.
Jonathan W. Wolfe, Esq.
Barbara A. Schweiger, Esq.
Evan A. Showell, Esq.
293 Eisenhower Parkway
Livingston, New Jersey 07039
*Attorneys for Plaintiffs Maureen
Stewart and Kelly Lamicella*